

LAW OFFICES OF DALE K. GALIPO
Dale K. Galipo, SBN 144074
dalekgalipo@yahoo.com
Eric Valenzuela, SBN 284500
evalenzuela@galipolaw.com
21800 Burbank Blvd., Suite 310
Woodland Hills, California 91367
dalekgalipo@yahoo.com
Telephone: (818) 347-3333
Facsimile: (818) 347-4118

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

GALE SOSTEK, et al.,
Plaintiffs,

vs.

COUNTY OF SAN BERNARDINO, et
al.,
Defendants.

Case No.: 5:23-cv-2236 MRA
(MRWx)

[Honorable Mónica Ramírez Almadani]

**DECLARATION OF ERIC
VALENZUELA IN SUPPORT OF
PLAINTIFFS' MOTION IN LIMINE
NO. 2**

Date: January 8, 2025
Time: 3:00 p.m.
Ctrm: 10B

DECLARATION OF ERIC VALENZUELA

I, Eric Valenzuela, hereby declare as follows:

1. I am an attorney licensed to practice law in the United States District Court for the Central District of California. I am one of the attorneys of record for Plaintiffs in the instant action. I make this declaration in support of Plaintiffs' Motion *in Limine* No. 2. to exclude any information unknown to the officers at the

1 time of the shooting. I have personal knowledge of the matters stated herein and
2 could and would testify competently thereto if called.

3 2. Attached hereto as “**Exhibit A**” and incorporated by reference herein are true
4 and correct copies of the pertinent portions of the interview of Diane Bilodeau,
5 taken in this action on April 11, 2023.

6 3. Attached hereto as “**Exhibit B**” and incorporated by reference herein are true
7 and correct copies of a photograph of Decedent’s abdomen tattoo taken during
8 autopsy.

9 I declare under penalty of perjury under the laws of the United States of
10 America that the foregoing is true and correct.

11 DATED: December 11, 2024 THE LAW OFFICES OF DALE K. GALIPO
12

13
14 By: /s/ Eric Valenzuela
15 Eric Valenzuela
16 Attorneys for Plaintiff
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
